UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

)	
JOHN D. CERQUEIRA,)	
Plaintiff,)	
V.)	
AMERICAN AIRLINES, INC.,)	CIVIL ACTION NO.: 05-11652 WGY
Defendant.)	
)	

MOTION FOR ATTORNEY ALEC BRAMLETT TO BE ADMITTED PRO HAC VICE IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Counsel for the defendant, American Airlines, Inc. ("American") moves this Court to admit attorney Alec Bramlett *pro hac vice* to appear before this court for the purpose of representing American in the above-captioned action. As grounds therefore, counsel states the following:

- 1. I, Michael A. Fitzhugh, am an attorney in good standing duly licensed to practice law in the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts.
- 2. Alec Bramlett is in-house counsel for American and is an attorney in good standing licensed to practice law in the United States District Courts for the Northern District and Eastern District of Texas. Certificates of Good Standing for each jurisdiction to which Attorney Bramlett is a member are submitted herewith.
- 3. As in-house counsel for the defendant, Attorney Bramlett has represented American in many arenas, and has trial experience in that capacity.

4. Alec Bramlett has never been held in contempt of court, censored, suspended or disbarred by any court. In addition, he is familiar with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts.

This is Alec Bramlett's first application for admittance pro hac vice in the United
 States District Court for the District of Massachusetts.

WHEREFORE, I respectfully request that the Court allow this motion for the admittance of Alec Bramlett *pro hac vice* to provide legal representation for the defendant, American Airlines, Inc., before the United States District Court for the District of Massachusetts in the instant action. An Affidavit of Alec Bramlett is submitted herewith in support of this motion.

Dated: December 2 \$2006

Respectfully submitted,

AMERICAN AIRLINES, INC.

By its Attorneys,

Michael A. Fitzhugh, (BBO 169700)

Amy Cashore Mariani, (BBO #630160)

FITZHUGH, PARKER & ALVARO LLP

155 Federal Street, Suite 1700

Boston, MA 02110-1727

(617) 695-2330

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 28, 2006.

Michael A. Fitzhugh

CERTIFICATE OF CONFERENCE

I hereby certify that on December 18, 2006, at 5:43 p.m., I sent an email to plaintiff's counsel, Michael Kirkpatrick, advising him of Defendant's intent to file the instant motion. On December 19, 2006 at 10:17 a.m., Attorney Kirkpatrick responded that Plaintiff would not oppose the instant motion.

Amy Cashbre Marian

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JOHN D. CERQUEIRA,	
Plaintiff,)
V.	CIVIL ACTION NO.: 05-11652 WGY
AMERICAN AIRLINES, INC.,	
Defendant.))
	j

AFFIDAVIT OF ALEC BRAMLETT IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

- I, Alec Bramlett, hereby depose and state:
- 1. I am in-house counsel for the defendant, American Airlines, Inc. ("American") and am an attorney in good standing licensed to practice law in the United States District Courts for the Northern and Eastern Districts of Texas. I have submitted herewith Certificates of Good Standing for each jurisdiction to which I am a member.
- 2. As in-house counsel for the defendant, I have represented American in many arenas, and have trial experience in that capacity.
- 3. I have never been held in contempt of court, or been censored, suspended or disbarred by any court. In addition, I am familiar with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the District of Massachusetts.
- 4. This is my first application for admittance *pro hac vice* in the United States District Court for the District of Massachusetts.

Filed 12/28/2006

Bramlett

5. I seek to appear on behalf of American in this case and it is desirable that I be able to appear personally and argue before this Court and to file papers in this action when it is expedient to do so.

WHEREFORE, I respectfully request leave to appear *pro hac vice* before this Court in the instant action.

Signed under the pains and penalties of perjury this

day of December, 2006.



UNITED STATES DISTRICT COURT Eastern District of Texas

Certificate of Good Standing

I, David J. Maland, Clerk of this Court, certify that

Thomas Alexander Bramlett

was duly admitted to practice in this Court on

February 12, 1996, and is in good standing

as a member of the Bar of this Court.

Dated at Beaumont, Texas

Navid Malane

Clerk of Court

December 20, 2006

on

Certificate of Good Standing

UNITED STATES DISTRICT COURT

Page 7 of 7

NORTHERN DISTRICT OF TEXAS

in said Court on 12/5/88, and is in good standing as a member of the bar of said Court. DO HEREBY CERTIFY that **Thomas Alexander Bramlett**, Bar #02870040, was duly admitted to practice I, KAREN MITCHELL, Clerk of the United States District Court, Northern District of Texas,

Signed at Dallas, Texas on December 20, 2006.

KAREN MITCHELL, Clerk

Deputy Clerk

BY: